

REMARKS***Summary of the Office Action***

Claims 30, 59, 61, 63, 64 and 65 stand rejected under 35 U.S.C. § 102(e) as allegedly anticipated by U.S. Patent No. 5,639,250 to Neef *et al.* (*Neef*).

Claims 53 and 55 stand rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over *Neef*.

Claims 1, 52, 54, 56, 57, 58, 60 and 62 stand rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over *Neef* in view of U.S. Patent No. 4,530,561 to Tyree *et al.* (*Tyree*).

Summary of the Response to the Office Action

Applicants have amended independent claim 30 without prejudice or disclaimer. Claims 1, 30, and 52-65 are presently pending.

The Rejection under 35 U.S.C. § 102(e)

Independent claim 30, and dependent claims 59, 61, 63, 64 and 65, which depend from independent claim 30, stand rejected as allegedly anticipated by *Neef*. Applicants respectfully traverse the rejection for at least the following reasons.

Independent claim 30, as amended, recites first and second end pieces with first and second staggered mounting extensions wherein “the first mounting extension extends laterally from a side of the first end piece and the second mounting extension extends laterally from a side of the second end piece.” *Neef* fails to teach or suggest this feature. Accordingly, Applicants submit that independent claim 30, as amended, is allowable. Moreover, Applicants respectfully assert that dependent claims 59, 61, 63, 64 and 65 are allowable at least because of their dependence from independent claim 30, as amended, and the reasons set forth above. Accordingly, the rejections under 35 U.S.C. § 102(e) should be withdrawn.

The Rejections under 35 U.S.C. § 103(a)

Claims 53 and 55, which depend from independent claim 1, stand rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over *Neef*. Independent claim 1, and dependent claims 52, 54, 56, 57, 58, which depend from independent claim 1, and dependent claims 60 and 62, which depend from independent claim 30, stand rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over *Neef* in view of *Tyree*. Applicants respectfully traverse these rejections for at least the following reasons.

Claims 53 and 55, which depend from claim 1, stand rejected as based on *Neef* alone. In contrast, claim 1 stands rejected under *Neef* in view of *Tyree*. If independent claim 1 stands rejected under both *Neef* and *Tyree*, Applicants assert that a rejection of claims 53 and 55 under 35 U.S.C. § 103(a) based on *Neef* alone is improper and should be withdrawn.

Even in view of both *Neef* and *Tyree*, however, the rejections under 35 U.S.C. § 103(a) are improper. Independent claim 1 recites first and second end pieces wherein “a first hold-down tab extends laterally from a side of the first end piece” and a “second hold-down tab extends laterally from a side of the second end piece,” and the “first hold-down tab is staggered relative to the location of the second hold-down tab.” Independent claim 30, as amended, discloses first and second staggered mounting extensions wherein “the first mounting extension extends laterally from a side of the first end piece and the second mounting extension extends laterally from a side of the second end piece.”

In contrast, *Neef* discloses pegs 36, not laterally-extending hold-down tabs. Col 2, line 60; Fig. 3. The Office Action at page 3 instead asserts that in light of *Tyree* it would have been obvious to provide *Neef* with laterally extending hold-down tabs. Even if it were assumed that this combination is proper, which it is not, the combination would fail to provide staggered

laterally extending hold-down tabs. *Tyree* discloses “[a]n electrical connector including a body section 1 and feet members 2 mounted on either side.” Abstract, lines 1-3. Each foot member includes a centrally positioned fastener hole (number not given). The feet members 2 are symmetrically positioned, not staggered. Hence, the combination would fail to achieve potential benefits of stabilizing the connector body 1 against rocking or other movement. Moreover, the combination would also fail to achieve the potential benefit of nesting or merging with another similarly-situated connector. Instead, the combination would sit without nesting, wasting substrate space. *See Tyree* Figs. 3-4.

Neither *Neef* nor *Tyree*, whether alone or in combination, teach or suggest first and second end pieces wherein a “first hold-down tab extends laterally from a side of the first end piece” and a “second hold-down tab extends laterally from a side of the second end piece” as recited in independent claim 1. Nor do *Neef* or *Tyree*, whether alone or in combination, teach or suggest first and second staggered mounting extensions wherein “the first mounting extension extends laterally from a side of the first end piece and the second mounting extension extends laterally from a side of the second end piece” as recited in independent claim 30. Moreover, neither *Neef* nor *Tyree*, whether alone or in combination, teach or suggest staggering the “first hold-down tab . . . relative to the location of the second hold-down tab.”

Since neither *Neef* nor *Tyree* teach or suggest these features, Applicants submit that independent claim 1 is allowable. Moreover, Applicants submit that dependent claims 52-58, which depend from independent claim 1, and dependent claims 60 and 62, which depend from amended independent claim 30, are allowable at least because of their respective dependencies from independent claims 1 and 30, and the reasons set forth above. Accordingly, the rejections under 35 U.S.C. § 103(a) should be withdrawn.

CONCLUSION

In view of the foregoing, Applicants respectfully request reconsideration and the timely allowance of the pending claims. Should the Examiner feel that there are any issues outstanding after consideration of this response, the Examiner is invited to contact Applicants' undersigned representative to expedite prosecution.

If there are any other fees due in connection with the filing of this response, please charge the fees to our Deposit Account No. 50-0310. If a fee is required for an extension of time under 37 C.F.R. § 1.136 not accounted for above, such an extension is requested and the fee should also be charged to our Deposit Account.

Respectfully submitted,

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